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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PABLO VALENTE CASTANEDA, AND  
ANGELICA MARIE ROMO,  
  
Defendants.

CASE NO. 1:23-CR-00014-NODJ-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: May 22, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Barbara A. McAuliffe

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 22, 2024.
2. By this stipulation, defendants now move to continue the status conference until July 10, 2024, and to exclude time between May 22, 2024, and July 10, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes reports, photographs, and audio files. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
  - b) Counsel for defendants desire additional time to further review discovery, discuss

1 potential resolution with his client and the government, and investigate and prepare for trial.

2 c) The parties will be prepared to set a trial date if the case has not resolved before  
3 the next status conference.

4 d) Counsel for defendants believe that failure to grant the above-requested  
5 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
6 into account the exercise of due diligence.

7 e) The government does not object to the continuance.

8 f) Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of May 22, 2024 to July 10, 2024,  
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
14 because it results from a continuance granted by the Court at defendants' request on the basis of  
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
16 of the public and the defendants in a speedy trial.

17 h) The parties also agree that this continuance is necessary for several reasons,  
18 including but not limited to, the need to permit time for the parties to exchange supplemental  
19 discovery, engage in plea negotiations, and for the defense to continue its investigation and  
20 preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 14, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ STEPHANIE M. STOKMAN  
STEPHANIE M. STOKMAN  
Assistant United States Attorney

Dated: May 14, 2024

/s/ MARIO DISALVO  
MARIO DISALVO  
Counsel for Defendant  
PABLO VALENTE  
CASTANEDA

Dated: May 14, 2024

/s/ ANTHONY CAPOZZI  
ANTHONY CAPOZZI  
Counsel for Defendant  
ANGELICA MARIE ROMO

**ORDER**

IT IS SO ORDERED that the status conference is continued from May 22, 2024, to **July 10, 2024, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: May 14, 2024

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE